

Second Level Domain Names & Subdomains

**APTLD Non-Technical Training
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Agenda

- **Introduction**
- **Second Level Domains**
 - Background to 2LDs
 - The .my experience
 - Case studies
 - Questions arising
- **Subdomains**
 - Background to subdomains in 2LD context
 - The .my position
 - Case study
 - Questions arising
- **Comments & Discussion**

Second Level Domain Names

What Is It?

- **What is a Second Level Domain Name?**
 - **In the context of the Domain Name System**
 - > *“A domain that is directly below a top-level domain”*
(en.wikipedia.org)
 - > www.XYZ.com
 - **In the context of the Country Code Domain Name System**
 - > A second level domain to a country code top-level domain
 - > www.xyz.COM.my
 - > Traditionally set apart by ccTLD registries for the registration of third-level domains

The Rise of 2LDs

- However, second level domains (2LDs) are increasingly being opened up by ccTLDs world wide for registration
- As at mid 2005, close to 150 ccTLDs (out of approximately 240 ccTLDs) permitted the registration of 2LDs by end users
 - > Subject to varying degrees of qualification / restrictions such as residency requirements, etc
 - > Number significantly higher today
- Majority of APTLD members allow registration of 2LDs by end users.
e.g. **.vn**, **.cn**, **.sg**, **.hk**, **.ph**
- **.ae** launched 2LD

Why 2LDs?

- **There seems to be growing demand for availability of 2LDs at ccTLD level globally**
- **Possible reasons behind demand:**
 - **More eye catching**
 - **Easier to remember**
 - **Good for business**
 - **Provides branding opportunities**
 - > For countries, e.g. **.my**
 - > For certain industries, e.g. **.tv .fm**
- **From a national perspective, opening up 2LDs by ccTLDs is probably hoped to result in**
 - **an increased rate of domain name registration**
 - **more local online activity**

Types of 2LD Deployment

- There are many differing approaches to opening up 2LDs at ccTLD level
- **Completely Open**
 - Open to all
 - No residency requirements
 - Minimal or no requirements for documentary proof
 - **.be .dk**
- **Restricted**
 - Local residency or agent requirements
 - Open for certain categories only
 - **.us .ca .vn**
- **All those in between**

.my & 2LDs

- **.my 2LDs currently limited to seven 2LDs**
 - *‘.com.my’, ‘.net.my’, ‘.org.my’, ‘.gov.my’, ‘.edu.my’, ‘.mil.my’ and ‘.name.my’*
- **.my 2LDs initially open for registration in early 1990s**
 - until reserved for registration of third level domains in keeping with global trend amongst ccTLDS
- **.my 2LDs now once again being proposed to be opened for registration**
- **Currently undergoing consultative and regulatory approvals process**
 - **.my’s (on-going) experience illustrative of issues that may need to be considered in opening up 2LDs**

.my & 2LDs

- **Administration and governance of .my falls under ambit of [Communications and Multimedia Act 1998](#)**
- **Prior to launching 2LDs, .my required to go through a consultative process involving all stakeholders:**
 - **Public**
 - **Service Providers**
 - **Regulator**
 - **Government**

.my & 2LDs

- **Overview of process in Malaysia:**
 - **Public Consultation Paper on Reintroducing 2LDs issued**
 - **Report to regulator on the public feedback received and discussion of proposed approach for .my 2LDs**
 - **Report on Public Consultation Exercise issued to public with request for further public feedback issued**
 - **Report to regulator on public feedback and discussion of issues arising**
 - **Preparations for the introduction of 2LDs pending regulatory go-ahead**

.my 2LD Major Issues

- **.my 2LD policy considerations:**
 - **Whether the reintroduction of 2LDs and lack of categorisation would confuse Internet users?**
 - **Was it an appropriate time for the reintroduction of 2LDs to the Malaysian public?**
 - **Whether 2LDs are to be subjected to local presence requirements?**
 - **Whether any governmental/institutional names are to be part of 2LD exercise or reserved?**

.my 2LD Major Issues

- **.my 2LD policy considerations:**
 - **Interests to be given preference for registration of 2LDs before it is opened to the public**
 - > **All existing third level domain name registrants?**
 - > **Trade mark holders?**
 - > **Registered businesses?**
 - **Basis of a decision to be made as to which 2LD applicant is to be given preference to a particular 2LD?**

.my 2LD Major Issues

- **.my 2LD policy considerations:**
 - **What should be the duration provided for pre-registration?**
 - **Whether sub-domains created under 2LDs (e.g. xyz.abc123.my) can be made available or offered by the registrant to third parties?**
 - **Whether the existing rules and processes in relation to resolution of .my domain name disputes was adequate?**

.my 2LD Public Feedback

- **Feedback was overwhelmingly positive, e.g.**
 - High time for reintroduction
 - Will improve customer convenience
 - When can we register
 - How to register as a Reseller
- **Other feedback:**
 - Concern over confusion that could arise with shorter domain names
 - Should be limited to Malaysian entities
 - Open it to the world but expand list of prohibited names (regulator would like to include in the list, country names & names of IGOs)

.my 2LD Public Feedback

- **Other feedback:**
 - **Priority to be given to trademark holders**
 - **Priority to be given to existing 3LD registrants**
 - **Sunrise period of 2 months too long**
 - **Sunrise period too short, need 12 months**
 - **Need for a simpler registration process for 2LDs**
 - **Need for substantive proof of entitlement prior to registration**
 - **There should be no limit on number of 2LDs that can be registered**
 - **Individuals should be limited to 3 2LDs**
 - **Concern over possibility of widespread domain name squatting**
 - **The fees for the registration of 2LDs too high**

.my 2LD Public Feedback

- **.my's response to public feedback:**
 - **Confusion issue can be addressed via education**
 - **Exercise to relook list of prohibited names**
 - **MYNIC will retain its *"first come, first served"* policy with no specific preference for trademark holders**
 - **Would look at simplifying the registration process and reducing the need for supporting documents**
 - **Possibility of opening up .my to foreign registrants**
 - **No limit on number of 2LD registrations and no differentiation between applications by organisations and individuals**
 - **Any potential domain name squatting and trademark issues can be dealt with via the MYDRP**

.my 2LD Formulation

- **Subsequent to consultation with the MCMC, formulation proposed for the opening up of .my 2LDs:**
 - **First Phase**
 - > **Pre-registration period of 2 months**
 - > **Open to existing 3LD name registrants**
 - ⌘ **Restricted to Malaysian entities and individuals (as is the current policy)**
 - ⌘ **Not opened to trademark holders or registered businesses (unless have already registered 3LD)**
 - > **For exact name as registered for 3LD**
 - > **Subject to government related domain names being reserved**
 - > **Processed based on which 2LD applicant registered 3LD first in time**

.my 2LD Formulation

- **Second Phase**
 - > **Proposed duration of 6 months**
 - > **Open for general registration**
 - > **Open only to Malaysian entities and individuals**
 - > **Subject to existing rules on domain names, e.g. rules in respect of domain name choice**

- **Third Phase?**

Case Study - .hk

- **Eligibility**
 - Open to all
 - No local presence restriction

- **Three-tiered soft launch period (for both ASCII & Chinese 2LD):-**
 - **Priority Registration Period**
 - > HK trademark and service mark owners

 - **Pre-Registration Period**
 - > Current holders of .hk 3LDs

 - **Sunrise Period**
 - > Anyone who wishes to register a 2LD before the general launch

Case Study - .hk

- **Priority Registration Period**
 - > 8 weeks
 - > Documentary proof of trade/service marks required
 - > Preference based on existing 3LD, earliest date of 3LD registration & finally random draw
- **Pre-Registration Period**
 - > 5 weeks
 - > Preference given to government and statutory organisations over others
 - > On overlap, preference based on earliest date of 3LD registration (other than for .idv.hk)
- **Sunrise Period**
 - > 2 weeks
 - > Determined by random draw where there is an overlap

Case Study - .sg

- **Eligibility:**
 - Foreign applicants subject to local agent requirement

- **Priority & allocation:**
 - Priority for allocation given in following order:
 - > Singapore trademark owners
 - > Well known trademark owners
 - > All government organisations
 - > Existing 3LD registrants
 - > New applicants
 - Applications by same type of applicant (e.g. trademark owners) for same 2LD to result in bidding exercise
 - Allocation results can be objected to by public on grounds of non-compliance with SGNIC's 2LD guidelines

Questions Arising

- **.hk**
 - Experience with international registration
 - If there were any specific issues that arose during the course of rolling out 2LDs?
 - Reasons behind priority being given to trademark holders over existing 3LD registrants
- **.sg**
 - Experience with international registration
 - Reasons for priority to trademark and well known trademark owners
 - Extent of bidding for 2LDs that was in fact carried out
 - Extent of objections to allocation results
- **.au & .nz**
 - Position on opening up 2LDs for .au & .nz respectively

Thoughts on Approach to 2LDs

- **Ultimate formulation is reflective of that ccTLD's "tuning" of the balance between:**
 - **Promoting the uptake of the 2LD from a numbers and commercial perspective**
 - > **Opening to the world**
 - > **First come, first served**
 - > **Minimal supporting documentation**
 - **Safeguarding against potential abuse of the 2LD and consequent diminution in "national" value**
- **Approach of each ccTLD is dependent upon national priorities and ambitions for the ccTLD**

Subdomains

Subdomains

- *“In the Domain Name System (DNS) hierarchy, a subdomain is a domain that is part of a larger domain. For example, "example.com" is a subdomain of the "com" top-level domain (TLD) and "www.example.com" is a subdomain of "example.com". In fact, the "com" TLD is a subdomain of the root domain, "."*

(en.wikipedia.org)

- **In the context of 2LDs, the discussion relating to subdomains refers to:**

> abc.123.cc

Subdomains & 2LDs

- In the .my 2LD formulation, it is proposed that:
 - Subdomains created under 2LDs (e.g. **XYZ**.abc123.my) cannot be made available or offered by the registrant to third parties,
 - i.e. no dealing in the subdomains whether for profit or otherwise
- Some feedback received during public consultation exercise raises issues as to viability of such a restriction in light of commercial practices,
 - **andrew.zoto.my** (for a commercial photo website)
 - **johan.mcisinsurance.my** (for an insurance company's website)

Subdomains & 2LDs

- **.my position on subdomains premised upon:**
 - Creation of subdomains is controlled by the registrant
 - Control that .my can exert does not extend to the subdomain level
 - .my dispute resolution procedure not intended to extend to subdomains
 - Trademark and servicemark holders, may be doubly disadvantaged
- **As a consequence:**
 - Prohibit registrants from dealing in subdomains
 - Enables termination of registration in the event of non-compliance

Case Study - .sg

- **.sg domain name registration agreement:**
 - “... where the Registrant has registered a second-level domain name under the top-level domain of .sg, the Registrant will not, whether directly or indirectly, and whether for profit or otherwise, without the prior written consent of SGNIC create, operate, lend, lease, license, register, assign, transfer or otherwise deal in any sub-domains or otherwise permit the use thereof by, on behalf of, or for the benefit of any third party...”
 - Questions that arise:
 - > Reasons behind .sg taking such a stance
 - > Methods utilised by .sg to monitor compliance
 - > Views of commercial practices and realities in relation to subdomains

Comments and Discussion

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